

**Rule 21 Working Group Meeting No. 48**  
**SACRAMENTO, CEC Offices**  
**1516 9<sup>th</sup> Street**  
**Sacramento, CA**

**Meeting Date: September 26, 2003**

**Chair:**

Scott Tomashefsky, CEC

**On Phone:**

Dave Redding, Riverside

Bill Cook, SDG&E

**In Person:**

Werner	Blumer	CPUC/ED
Herb	Clowers	Hess Microgen
George	Couts	SCE
Tom	Dossey	SCE
Bill	Erdman	DUA
Ed	Grebel	SCE
John	Horak	Basler Electric
Mike	Iammarino	SDG&E
Karl	Iliev	SDG&E
Jerry	Jackson	PG&E
Scott	Lacy	SCE
Robin	Luke	RealEnergy
Bill	Martini	Tecogen, Inc.
Anthony	Mazy	CPUC/ORA
Dave	Michel	California Energy Commission
Randy	Minnier	MPE Consulting
Bob	Panora	Tecogen
Edan	Prabhu	Reflective Energies
Tracy	Saville	RealEnergy
Jim	Skeen	SMUD
Chuck	Solt	Lindh
Bill	Steeley	EPRI
Scott	Steffe	Modesto Irrigation District
Gerome	Torribio	SCE
Mohammad	Vaziri	PG&E
Chuck	Whitaker	Endecon Engineering
Leon	Woods	Worldwater

## **Common Meeting**

1. The next Meeting is in Oakland and the date is tentatively Thursday, October 30
2. The California Interconnection Guidebook has been approved by the CEC and is being readied for posting on the website with final formatting checks. Edan Prabhu thanked all those who reviewed the document and provided valuable comments.
3. The DG Monitoring Program data is back on its website at [www.dgmonitors.com](http://www.dgmonitors.com). The new website is faster. A 600 kW PV system is installed at the Moscone Center in San Francisco. With Dave Michel's help, we are working with the City to add the PV system to the monitoring program. It is a large non-export PV, and is on a network distribution system.
4. Errors in the UL report relative to the Plug Power certification (T124) are being corrected by UL. Once we receive official confirmation that the report has been corrected, the subcommittee will meet via conference call to finalize the approval
5. Herb Clowers of Hess Microgen noted that Hess is developing specific test requirements to support their Certification request (T123). Those requirements will be forwarded to the Rule 21 workgroup and the testing laboratory for review prior to initiating the tests.
6. PG&E is verifying the DG list database and as a result the total kW has shrunk slightly. PG&E has several projects that are approved but have been placed on-hold by the applicant; this placing on hold is a recent trend.
7. SCE has identified duplicate applications with an asterisk those that are already on line. A few installations are making new applications to convert their non-export systems to inadvertent export. The total population of this subset is about 10 systems.
8. PG&E is currently in the process of developing a potential PPA for small generators (<100kW). The price for the power could be either wholesale or retail. One possibility could be to offer SRAC (Short term avoided cost) for energy-only, without paying for the capacity component. SCE has signed several agreements to buy power from small PURPA-qualified systems below 100kW. Jerry would like to see PG&E agreements to for power greater than 100kW as well. PG&E's current thinking is that these new PPAs would apply only to renewables for the present. Perhaps a workshop could be organized to help start this effort.
9. ISO has an aggregation program available but it is complex. If the utilities set up an aggregation system, it would cost them money, and they should be compensated for their efforts.
10. Whereas initially, it was anticipated that inadvertent export would occur for small quantities of power and only occasionally, some requests for inadvertent export agreements are asking for several such exports per day, and up to the amount of the entire generator output. While SCE receives many applications for inadvertent export, SMUD has received no such applications, and PG&E has also not yet processed an inadvertent export application. It is anticipated that some dairies could desire continuous export under the new Net Metering tariffs.
11. A process for evaluating (screening) inadvertent export has been developed under T106. This process will need to be incorporated in to the Supplemental Review Guideline. In addition, the tech group, will review existing Rule 21 language to

- determine if additional language or requirements need to be added. In addition, the contractual and payment issues related to inadvertent export need to be developed.
12. The PG&E White Paper defining PG&E's criteria for review of interconnection applications was issued by PG&E. While it is a public document, it presents a work in progress, and is not a final statement. PG&E will continue to evaluate technical requirements relative to interconnection. PG&E requested that the Working Group, including other Utilities, provide Technical and editorial comments. Technical comments should be sent to Moh Vaziri, and editorial comments to Jerry Jackson.
  13. Filings for compliance with AB 58 and 2228 are in progress. PG&E has been in discussions with CPUC staff, and has agreed to substitute certain pages of its prior filing and re-file next week. PG&E considers that it has a tariff in place for the dairy digester Net Metering, and is accepting applications on dairy generators. SCE had filed an Advice Letter about six months ago, but re-filed in mid-September in order to comply with certain administrative deadlines.
  14. AB1685 extending the DG Self-gen program for three more years was approved by the senate and assembly and was on the governor's desk for signature.
  15. Scott Tomashefsky reported that CRS exemption proceeding is on course for implementation in January.

### **Process Breakout**

16. P108: Streamlining Application Forms. After some discussion it was generally agreed that two application forms, one for small systems metering and the other for all others made the most sense. There was a discussion relative to language in the revised application form put forward to Mike Iammarino.
  - a. There was a lot of discussion relative to expiration dates.
  - b. The grid changes over time, technology changes over time, and the economics and market change over time. It is logical that an application and an approval for interconnection have expiration dates. The issue of expiration dates for applications and approved applications will be raised before the general session at the next meeting.
  - c. The application form should provide information that would help the customer consider the option to apply for standby exemptions, CTC exemptions, CRS exemption qualifications etc.; these exemptions will have their own forms
  - d. The language requesting information on whether the generator qualifies under CPUC Code 218.5 will remain and Mike Iammarino will add language that describes the requirements of 218.5 in words.
17. Mike will incorporate the changes that were discussed and issue one more revision. The goal is to have an Advice Letter filing by all IOUs by the end of 2003.
18. It would be nice to hold a training session for developers when the new application is ready. This could be in conjunction with the CADER DG Coalition conference in San Diego at the end of January 2004. The conference is planning half a day for training seminar for DG applications, permitting etc.

19. There was a brief discussion on the differences between Co-energy metering is different from Net Energy Metering. No follow-up action was planned.
20. The “Bin List” that Werner Blumer created last year was discussed. It would be prudent to combine the Bin List with the Net Metering changes desired and then roll it into the Action Items List. These changes would be combined with changes to Rule 21 needed because of the adoption of IEEE P 1547. These items will require amending Rule 21. The target completion date for these changes is the end of 2003. Jerry Jackson will develop proposed language to cover inadvertent export issues, and perhaps include this too in the revised Rule filing. Jerry will also consider net energy metering changes to the Rule. Werner will look at the existing Bin List to identify which issues are still alive; those issues that belong in Sections I and J will be given to the Technical Group.
21. The goal is to have two Advice Letter filings by the end of the year: A revised Rule 21 and a revised Application. Edan Prabhu will consider a special addition to the Actions Items List to track items related to modifying Rule 21.

### **Technical Breakout**

22. Briefly discussed the PG&E white paper, but few people had reviewed it so there were few comments
23. Bill Erdman discussed the DUIT DG on Networks Issues meeting tentatively scheduled for Nov in San Francisco
24. Discussed PG&E’s comments to the proposed revisions to the Export Screen (T101). Two main issues are: the proposed change in screen title and removal of the word “incidental” in Option 3. PG&E would prefer that the word remain in but be defined. The word was suggested for removal because it has two potential meanings— small (the intended meaning) and accidental (assumed meaning by some). Also, when we attempted a definition several months ago, we kept coming back to the requirements of Option 3 (25% of customer service panel rating, 50% or transformer rating) and concluded that such a circular definition was of little value. Moh Vaziri also commented that the proposed language regarding limiting export level using reverse power relaying would allow larger generation than intended, and promised to provide calculations to support the claim.

The group discussed the fundamental issue of whether any export should be allowed at all under simplified interconnection. The utilities were tasked with defining, before the next meeting, what level of export they would be comfortable with under simplified interconnection. Consideration should be given to a continuous level export versus a periodic export.

25. Discussed the Alternate Testing requirements (T107) for non-certified equipment. The tests are those commonly used to define “utility-grade” relays. Some minor changes were made to the text, and the group looked briefly at the proposed location for the test list (added to the second bullet under section 7.8.1.in Supplemental Review)
26. Tried to review the Inadvertent Export write-up (T105). However, T105 champion Bill Cook was participating via telephone and the acoustics of the phone-in

connection were not conducive to detailed discussion. We hope to finalize the discussion at the next meeting.

Respectfully Submitted:

Edan Prabhu

Approved:

Scott Tomashefsky